

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

NOV 0 6 2015

Mr. Robert Cronin, Director Old Town Demolition Project Lawrence Berkeley National Laboratory Mail Stop 75B0101 One Cyclotron Road Berkeley, California 94720 rdcronin@lbl.gov

Subject: Lawrence Berkeley National Laboratory - Request for Extension of Storage Time

Frame for PCB Waste, Room 150, Building 5 at Old Town Area

Dear Mr. Cronin:

Thank you for your October 15, 2015 letter requesting the U.S. Environmental Protection Agency Region 9 (EPA) to extend by 90 days the 30-day storage time for polychlorinated biphenyl (PCB) wastes in 40 CFR 761.65(c)(1) for a total of 120 days after the date of waste generation. The date of waste generation is October 9, 2015. This request is in connection with PCB/radioactive wastes in Room 150 in Building 5, Old Town at Lawrence Berkeley National Laboratory (LBNL). EPA is granting this request with conditions.

The entire Building 5, which is being demolished, has been designated by LBNL as a low level radioactive waste that will be disposed at the Department of Energy's Nevada National Security Site in Nevada. Accordingly, LBNL designated the entire Room 150 in Building 5 as a PCB/radioactive waste after it discovered PCB bulk product in that room. Room 150 was demolished and the waste generated by the demolition of that room is being stored at a designated waste accumulation area depicted in the enclosed figure. According to LBNL, the accumulation area (depicted in the attached figure) is fenced and locked and only authorized personnel have access to this area.

Based on the PCB component of the waste, EPA is granting LBNL's request to store PCB/radioactive waste from Room 150 onsite for up to 120 days after October 9, 2015. EPA is granting this request under 40 CFR 761.62(c) provided LBNL implements the activities described in its October 15, 2015 letter and adheres to the requirements in 40 CFR 761.65(c)(1), §761.65(c)(3), §761.40(a)(10), and applicable requirements in §761.65(c)(6)(i), and 40 CFR 761 Subpart K (e.g., notification of PCB activity). LBNL must meet any additional Federal requirements and all State and local requirements that may apply to packaging, temporary storage, and transportation of Room 150 PCB/radioactive waste.

We understand that LBNL plans on transporting the PCB/radioactive waste to the Nevada National Security Site and that LBNL's waste will not be stored at that DOE disposal facility before disposal.

We appreciate the opportunity to being of assistance to LBNL on PCB matters. Please call Carmen D. Santos if you have any questions concerning this letter.

Sincerely,

Jeff Scott, Director Land Division

Cc: Ron Pauer, LBNL (rpauer@lbl.gov)
Joseph Gantos, LBNL (njgantos@lbl.gov)
Kevin Bazzell, LBNL (kbazzell@lbl.gov)
Keith Takata (keith@keithtakata.com)
Jacinto Soto, DTSC (jsoto@dtsc.ca.gov)